



January 22, 2014

Mr. Jeffrey Dyber
Environmental Engineer 2
New York State Department of Environmental Conservation
Division of Environmental Remediation
Remedial Bureau A, 11th Floor
625 Broadway
Albany, New York 12233-7015

Re: Soil Vapor Extraction System Expansion Work Plan
Former Avis Headquarters Site – BCP Site No. C130206
900 Old Country Road, Garden City, New York

Dear Mr. Dyber:

This letter presents a Work Plan for the expansion of the soil vapor extraction system currently operating in the Retail D location in Building 1 at the Gallery at Westbury Plaza (formerly the Avis Headquarters Site) at 900 Old Country Road, Garden City New York.

As discussed in the 2013 fourth quarter data summary recently submitted to NYSDEC, the soil vapor monitoring data collected in the vacant Retail D space since July 2013, shows that No Further Action is the recommended outcome pursuant to the decision matrices presented in the NYSDOH Guidance for Evaluating Soil Vapor Intrusion in the State of New York (October 2006) (NYSDOH Guidance). Roux has proposed to expand the existing soil vapor extraction (SVE) system to ensure that sub slab vapor concentrations remain at the low current levels. The proposed expansion is described below.

Recommended SVE Expansion Work Plan

The expansion of the current SVE system includes the installation of two additional SVE wells at the rear of the Retail D space as an engineering control designed to permanently eliminate the low level, localized sub-slab soil vapor concentrations.

As shown on Figure 1, one SVE well (VE-4) will be installed to a depth of 5 feet below the floor slab, and constructed in the same manner as VE-1 through VE-3. The second well (VE-5) will be installed to a depth of 15 feet below the floor slab, with a 5 foot screened interval set from 10 to 15 feet below grade. Each SVE well will be equipped with manual control valves and a sample port. The SVE wells will be manifolded together using piping which will be connected directly to a 2.0 Hp regenerative blower. The blower will be vented

externally through a stack that will extend further than five feet above the building roofline. SVE well spacing will be designed to provide complete pneumatic coverage of the targeted portion of the Retail D Space. This will be verified during system startup using empirical pneumatic data.

SVE System Operations

During start-up of the expanded SVE system, an effluent air sample will be collected using a Summa canister and analyzed using USEPA TO-15 to verify the lack of a need for vapor treatment. The effluent air sample results of the expanded SVE system will be compared to the Air Guide 1 guidance values and will determine if vapor treatment is needed for the expanded SVE system.

The operational plan for the system will include weekly measurement of individual well and cumulative system effluent VOC concentrations using a PID. Individual well pneumatic measurements will also be collected to evaluate each wells radius of influence. The SVE system will be operated continuously until individual well and total system effluent concentrations stabilize over a two to four week period with no further reduction occurring. The system will then be shut off for one to two weeks. The system will be restarted and operated in a pulsed fashion until effluent plateaus are again reached. When no further VOC reduction is achieved through pulsed operation, the system will be shut off.

Based on Roux Associates' experience operating SVE systems at sites with similar contaminants at comparable concentrations, it is expected that operations will be completed within 6 to 12 months. During the operation of the Retail D SVE system, the soil vapor monitoring program for Retail Spaces E and F will continue as detailed in the RAWP. This includes shutting the system down one week prior to soil vapor sampling. Upon termination of the SVE system operation, the quarterly soil vapor monitoring program will resume in Retail D until four quarters of data have been collected that indicate No Further Action is required based on NYSDOH guidance.

The system expansion work is anticipated to take place in late January 2014, following NYSDEC approval of the modifications. Since the SVE system will continue operation past the 18-month timeframe designated for temporary engineering controls at sites that have been issued a Certificate of Completion (COC), a temporary Site Management Plan (SMP) and environmental easement will be required. Roux Associates anticipates submittal of the SMP in February 2014. Roux Associates intends to discontinue the operation of the SVE system and complete the soil vapor sampling necessary to demonstrate compliance with the Track 1 standards within five years of receipt of the COC, maintaining the Site's Track 1 status.

Schedule

The proposed schedule for the tasks described above is as follows assuming a start date of January 27, 2014.

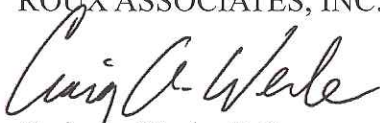
- Installation of additional SVE wells..... January 27-February 7, 2014

- Resume SVE operations February 10, 2014
- Anticipated operating period February 10 – September 15, 2014
- Preliminary system shut down/pulsed operation September 1 – November 1, 2014
- Final System shutdown/resume quarterly vapor monitoring November 15, 2014

If you have any questions concerning this submittal, please contact us at (631) 232-2600.

Sincerely,

ROUX ASSOCIATES, INC.



Craig A. Werle, P.G.
Principal Hydrogeologist

Attachments

cc: Mark Chertok/Jennifer Coghlan, Sive, Paget & Riesel, P.C.
Mike Berfield, Equity One, Inc.
Steve Karpinski, NYSDOH

Certification by Remedial Engineering, P.C.

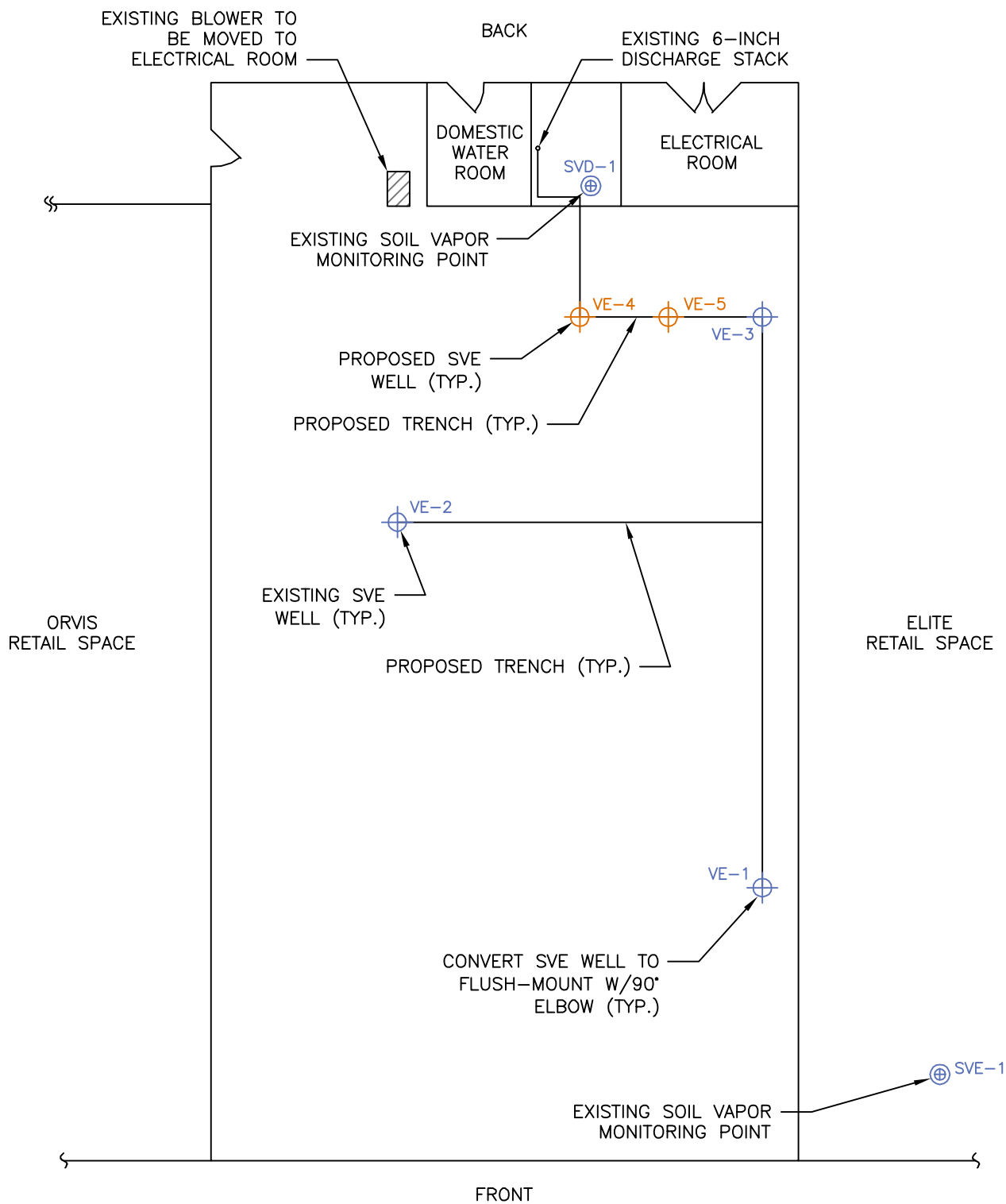
I, Charles J. McGuckin, P.E., certify that I am currently a NYS registered professional engineer and that this Work Plan was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10).

Charles J. McGuckin, P.E.
NYS Professional Engineer #069509

1/22/14

Date





Title:

PROPOSED SVE SYSTEM EXPANSION

FORMER AVIS HEADQUARTERS PROPERTY
900 OLD COUNTRY ROAD
GARDEN CITY, NEW YORK 11530

Prepared For:

EQUITY ONE, INC.

ROUX
ROUX ASSOCIATES, INC.
Environmental Consulting
& Management

Compiled by: G.N.

Date: 22JAN14

Prepared by: J.A.D.

Scale: AS SHOWN

Project Mgr: C.W.

Project: 1924.0001Y000

File: 1924.0001Y206.01.DWG

FIGURE

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